



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

NOV 30 2001

Ref. No. 01-0192

Mr. Phillip J. Lampert
Executive Director
National Ethanol Vehicle Coalition
3118 Emerald Lane
Jefferson City, MO 65109

Dear Mr. Lampert:

This responds to your letter of July 13, 2001, requesting guidance concerning the proper shipping name for your product "E85", which is a blended motor fuel containing 80 % ethyl alcohol and 20 % gasoline with a flash point range of -20° to -4° F. During a conversation with Ms. Helen Engrum of my staff, you indicated that you have received conflicting information on this issue.

Based on the information your provided, it is our opinion that the appropriate shipping description for your mixture of 80 % ethyl alcohol and 20 % gasoline is "Flammable liquid, n.o.s. (Ethyl alcohol, gasoline)." This opinion is based on the fact that the gasoline is the primary contributor to the low flash point of the material, rather than the ethyl alcohol which has a flash point of more than 50° F.

I hope this satisfies your inquiry.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



010192

172.101



National Ethanol Vehicle Coalition

Engrum

\$172.101

Proper Shipping Name
01-0192

EXECUTIVE COMMITTEE

Chairman
Harold Smedley
Colorado Corn Growers Assn.
Greeley, CO

Vice Chairman
Gary Marshall
Missouri Corn Growers Assn.
Jefferson City, MO

Treasurer/Secretary
Todd Sneller
Nebraska Ethanol Board
Lincoln, NE

BOARD OF DIRECTORS

Clinton Norris
BC, International
Boston, MA

Steve Core
Corn Plus, Inc.
Winnebago, MN

Jim Snider
DaimlerChrysler
Southfield, MI

Patty Stulp
Ethanol Management Company
Henderson, CO

Joe Wrone
Ford Motor Company
Dearborn, MI

Gary Herwick
General Motors Corporation
Detroit, MI

Larry Pearce
Governors' Ethanol Coalition
Lincoln, NE

Jere White
Kansas Corn Commission
Garnett, KS

Jim Czub
National Corn Growers Assn.
Schaghticoke, NY

Phillip J. Lampert
Executive Director

Charles M. Pallesen, Jr.
Counsel
Lincoln, NE

3118 Emerald Lane, Suite 100
Jefferson City, MO 65109
(573) 635-8445 phone
(573) 635-5466 fax
(877) 485-8595 toll free
email: nevco@e85fuel.com
www. E85fuel.com

July 13, 2001

Mike Johnson
U.S. Department of Transportation
Office of Hazardous Materials Standards
400 Seventh Street., S.W.
Washington, DC 20590

Dear Mr. Johnson:

I appreciate the time you took last week to visit with Randa Barker of this office regarding the shipping of E85 fuel.

As you know, E85 is a blended motor fuel that contains 80% ethyl alcohol and 20% petroleum and has a TCC flashpoint range of -20° to -4° F. The introduction of this fuel has raised a hazard communication question, specifically, the proper shipping description.

E85 is currently being shipped under the name "Denatured Alcohol," 3, NA 1987, PG II. The Department of Transportation recently published HM-215D, which is a final rule intended to harmonize United States regulations with the United Nations recommendations. One change that will impact our members is the deletion of certain NA identification numbers including NA 1987, which identified the proper shipping name "Denatured Alcohol." As a result, the name "Denatured Alcohol" also was deleted and is no longer a proper shipping name. Accordingly, we must change the proper shipping name we use for E85 fuel alcohol.

It is our understanding that the proper shipping name that now would most appropriately describe fuel alcohol would be "Alcohol N.O.S. (Ethanol, Gasoline)." The ID number would be UN 1987 instead of NA 1987, and the rest of the description would remain the same.

Because the effective date of this new rule is October 1, 2001, I would appreciate a response confirming the above as soon as possible.

Thank you for your assistance.

Sincerely,
NATIONAL ETHANOL VEHICLE COALITION


Phillip J. Lampert
Executive Director

PJL/rb



The National Ethanol Vehicle Coalition is the nation's primary advocate of the use of ethanol as an alternative form of transportation fuel and is supported in those efforts by automakers, corn growers, ethanol producers, the Governors' Ethanol Coalition and other advocates of the use of clean, domestic, renewable fuels.

Printed with corn/soybean ink on paper made from post consumer waste.